1 (Stipulating Parties Listed on Signature Pages) 2 3 4 5 6 7 8 UNITED STATES DISTRICT COURT 9 NORTHERN DISTRICT OF CALIFORNIA 10 SAN FRANCISCO DIVISION 11 12 13 In re: CATHODE RAY TUBE (CRT) Case No. 07-5944 SC **ANTITRUST LITIGATION** 14 **MDL No. 1917** This Document Relates to: 15 STIPULATION AND [PROPOSED] ORDER REGARDING SCHEDULING ALL ACTIONS 16 17 18 19 WHEREAS, the California Attorney General, whose state court action is coordinated with 20 this action for purposes only of fact and expert discovery, and Defendants agree that a 21 modification to the existing expert discovery schedule will aid in the efficient resolution of this 22 litigation; 23 WHEREAS, the proposed modification will change the existing deadlines for serving 24 expert reports, but will not change the existing fact discovery deadline (September 5, 2014) or the 25 trial date (March 9, 2015) in the federal litigation and is intended only to put the California 26 Attorney General's case on the same expert discovery schedule as that recently approved by this 27 Court as to the Indirect Purchaser Class Plaintiffs ("IPPs") and Direct Action Plaintiffs ("DAPs"); 28

1	IT IS HEREBY ST	TIPULATED AND AGREED by and between counsel for the
2	California Attorney General	and counsel for the undersigned Defendants ¹ in the above-captioned
3	actions as follows:	
4		<u>SCHEDULE</u>
5	March 25, 2014*	Last day for the California Attorney General to serve opening
6		expert reports on the merits; last day for Defendants to serve
7		opening expert reports on affirmative defenses;
8	June 24, 2014*	Last day for Defendants to serve opposition expert reports on the
9		merits; last day for the California Attorney General to serve
10		opposition expert reports on affirmative defenses;
11	August 5, 2014	Last day for the California Attorney General to serve rebuttal
12		expert reports on the merits; last day for Defendants to serve
13		rebuttal expert reports on affirmative defenses;
14	September 12, 2014	Last day for the California Attorney General and Defendants to
15		serve sur-rebuttal reports to any expert they are opposing and who
16		serves a rebuttal report;
17	*For any depositions	s that Plaintiffs have noticed, but have not yet taken, by March 25,
18	2014, the California Attorney General and Defendants may supplement their opening and	
19	opposition expert reports to	the extent that the supplements are limited to evidence that is elicited
20	during such depositions. An	y such supplements must be served by July 11, 2014.
21	All parties reserve th	e right to seek modification of the schedule based on the number of
22	expert reports, which is prese	ently unknown.
23		***
24	The undersigned Pa	arties jointly and respectfully request that the Court enter this
25	stipulation as an order.	
26	¹ The following entities do not join	n in this stipulation: Technicolor SA (f/k/a Thomson SA), Technicolor USA, Inc.
27 28	(f/k/a Thomson Consumer Electronics, Inc.), Mitsubishi Electric Corporation, Mitsubishi Digital Electronics America, Inc., and Mitsubishi Electric US, Inc. (f/k/a Mitsubishi Electric and Electronics, USA, Inc.). In addition, on August 1, 2013, Special Master Legge entered an Order (Dkt. No. 1820) staying discovery against Thomson Consumer Electronics, Inc., so it is not participating in discovery.	

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1 PURSUANT TO STIPULATION, IT IS SO ORDERED 2 Dated: 01/17/2014 3 4 Judge Samuel Conti 5 DATED: January 8, 2014 KIRKLA 6 By: /s/ Eliot X/Adelson ELIOT A. ADBUSON 7 Email: eadelson@kissandCBI 8 JAMES MAXWELL COOPER (SBN 284054) max.cooper@kirkland.com 9 KIRKLAND & ELLIS LLP 555 California Street 10 27th Floor San Francisco, CA 94104 11 Telephone: (415) 439-1400 Facsimile: (415) 439-1500 12 JAMES H. MUTCHNIK, P.C. (pro hac vice) 13 jmutchnik@kirkland.com KATE WHEATON (pro hac vice) 14 kate.wheaton@kirkland.com KIRKLAND & ELLIS LLP 15 300 North LaSalle Chicago, Illinois 60654 16 Telephone: (312) 862-2000 Facsimile: (312) 862-2200 17 Attorneys for Defendants Hitachi, Ltd., Hitachi Displays, Ltd. (n/k/a Japan Display Inc.), Hitachi 18 Asia, Ltd., Hitachi America, Ltd., and Hitachi Electronic Devices (USA), Inc. 19 WINSTON & STRAWN LLP 20 By: /s/ Jeffrey L. Kessler 21 JEFFREY L. KESSLER (pro hac vice) Email: JKessler@winston.com 22 A. PAUL VICTOR (pro hac vice) Email: PVictor@winston.com 23 ALDO A. BADINI (SBN 257086) Email: ABadini@winston.com 24 EVA W. COLE (pro hac vice) Email: EWCole@winston.com 25 MOLLY M. DONOVAN Email: MMDonovan@winston.com 26 WINSTON & STRAWN LLP 200 Park Avenue 27 New York, NY 10166 Telephone: (212) 294-6700 28 Facsimile: (212) 294-4700

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9	Pursuant to Local Rule 5-1(i), the filer attests that the concurrence in the filing of this
10	document has been obtained from each of the above signatories.
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